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Evan R. Chesler
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825 Eighth Avenue
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Attorneys for Defendant Qualcomm Incorporated

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

BROADCOM CORPORATION,	:	
	:	Civil Action No. 05-3350 (MLC) (JJH)
Plaintiff,	:	
	:	
v.	:	
	:	
QUALCOMM INCORPORATED,	:	
	:	
Defendant.	:	

NOTICE OF MOTION FOR ADMISSION *PRO HAC VICE*

PLEASE TAKE NOTICE that as soon as counsel may be heard, Defendant Qualcomm Incorporated ("Defendant") will move before this Court for an order admitting Peter T. Barbur and Elizabeth L. Grayer of the law firm of Cravath, Swaine & Moore LLP, *pro hac vice* in this action.

In support of the motion, Defendant relies on the Accompanying Affidavits of Peter T. Barbur and Elizabeth L. Grayer. Defendant respectfully submits that no brief is necessary in connection with this motion, in as much as the bases of this application are set forth in the accompanying Affidavits.

Dated: October 9, 2007

McCARTER & ENGLISH, LLP

By: s/ William J. O'Shaughnessy
William J. O'Shaughnessy
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QUALCOMM INCORPORATED,	:	
	:	
Defendant.	:	

**CERTIFICATION OF WILLIAM J. O'SHAUGHNESSY
IN SUPPORT OF *PRO HAC VICE* ADMISSION OF
PETER T. BARBUR AND ELIZABETH L. GRAYER**

WILLIAM J. O'SHAUGHNESSY, of full age, certifies as follows:

1. I am a member of the bar of the State of New Jersey and of McCarter & English, LLP, counsel for Defendant Qualcomm Incorporated in this action.

2. I make this Certification in support of the application of Peter T. Barbur, Esq. and Elizabeth L. Grayer, Esq. for admission to the bar of this Court *pro hac vice*.

3. Affidavits from Mr. Barbur and Ms. Grayer in support of their respective applications for admission to the bar of this Court *pro hac vice* have also been submitted.

4. Mr. Barbur and Ms. Grayer have been advised of their obligations to comply with the Rules of Professional Conduct adopted by the New Jersey Supreme Court, and of Local Rule 101.1(c) which governs the admission of counsel *pro hac vice*.

5. Mr. Barbur and Ms. Grayer will be associated with attorneys from the firm of McCarter & English, LLP in the defense of this matter, and a member of McCarter & English, LLP will sign all pleadings, briefs, and other papers filed with the Court.

6. Our adversary, Broadcom Corporation, through its attorney, David Stone of Boies, Schiller & Flexner LLP, has consented to the *pro hac vice* admission of Mr. Barbur and Ms. Grayer.

I certify under penalty of perjury that the foregoing is true and correct.

s/ William J. O'Shaughnessy
William J. O'Shaughnessy

DATED: October 9, 2007

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QUALCOMM INCORPORATED,	:	
	:	
Defendant.	:	

STATE OF NEW YORK)
) ss.
COUNTY OF NEW YORK)

**AFFIDAVIT OF PETER T. BARBUR IN SUPPORT OF
ADMISSION *PRO HAC VICE***

Peter T. Barbur, being duly sworn, deposes and says:

1. I am a member of the law firm of Cravath, Swaine & Moore LLP. My business address is Worldwide Plaza, 825 Eighth Avenue, New York, New York 10019. I make this

Affidavit in support of the motion of Defendant Qualcomm Incorporated (“Qualcomm”) to admit me *pro hac vice* for purposes of representing them in this matter.

2. I am a member in good standing of the bar of the State of New York, the state of which I am a resident and in which I principally practice law. There are no disciplinary proceedings presently pending against me, and no discipline has previously been imposed upon me.

3. I am a 1987 graduate of New York University School of Law. I was admitted to practice in the State of New York in 1989. I am also admitted to practice before the United States District Court for the Southern District of New York (1990), the United States Court of Appeals for the Second Circuit (1997) and the United States Court of Appeals for the Ninth Circuit (1997).

4. My principal practice involves civil and commercial litigation.

5. Our law firm is counsel for Qualcomm and we have represented Qualcomm in other lawsuits, and Qualcomm has requested that we represent it in all aspects of this case, including trial, and I accordingly request that the Court admit me *pro hac vice* for these purposes.

6. I am familiar with and, if admitted, will abide by the Local Rules of this Court. I am associated in this matter with New Jersey counsel, William J. O’Shaughnessy, Esq. of the law firm of McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102.

7. I will make any required payment to the New Jersey Lawyers’ Fund for Client Protection.



Peter T. Barbur

Sworn and subscribed to before me,
a notary public of the State of New York,
this 9th day of October, 2007.



SUNDER SACHDEV
Notary Public, State of New York
No. 01SA4834721
Qualified in Queens County
Certificate Filed in New York County
Commission Expires Sept. 30, 2009

William J. O'Shaughnessy (WJO 5256)
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	:	
QUALCOMM INCORPORATED,	:	
	:	
Defendant.	:	

STATE OF NEW YORK)
) ss.
COUNTY OF NEW YORK)

**AFFIDAVIT OF ELIZABETH L. GRAYER IN SUPPORT OF
ADMISSION *PRO HAC VICE***

Elizabeth L. Grayer, being duly sworn, deposes and says:

1. I am a member of the law firm of Cravath, Swaine & Moore LLP. My business address is Worldwide Plaza, 825 Eighth Avenue, New York, New York 10019. I make this

Affidavit in support of the motion of Defendant Qualcomm Incorporated (“Qualcomm”) to admit me *pro hac vice* for purposes of representing them in this matter.

2. I am a member in good standing of the bar of the State of New York, the state of which I am a resident and in which I principally practice law. There are no disciplinary proceedings presently pending against me, and no discipline has previously been imposed upon me.

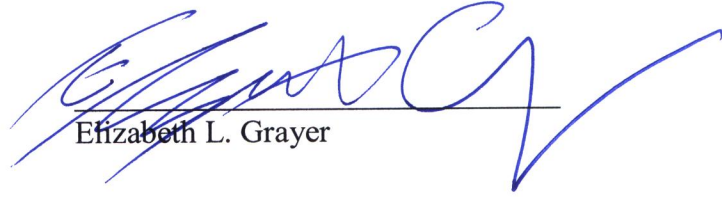
3. I am a 1989 graduate of Harvard Law School. I was admitted to practice in the State of New York in 1990. I am also admitted to practice before the United States District Court for the Southern District of New York (1995), the United States District Court for the Eastern District of New York (2006) and the United States Court of Appeals for the Ninth Circuit (1997).

4. My principal practice involves civil and commercial litigation.

5. Our law firm is counsel for Qualcomm and we have represented Qualcomm in other lawsuits, and Qualcomm has requested that we represent it in all aspects of this case, including trial, and I accordingly request that the Court admit me *pro hac vice* for these purposes.

6. I am familiar with and, if admitted, will abide by the Local Rules of this Court. I am associated in this matter with New Jersey counsel, William J. O’Shaughnessy, Esq. of the law firm of McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102.

7. I will make any required payment to the New Jersey Lawyers’ Fund for Client Protection.


Elizabeth L. Grayer

Sworn and subscribed to before me,
a notary public of the State of New York,
this 9th day of October, 2007.



RALPH M. DIONNE
Notary Public, State of New York
No. 01DI6042070
Qualified in Queens County
Certificate Filed in New York County
Commission Expires February 28, 2011

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QUALCOMM INCORPORATED,	:	
	:	
Defendant.	:	

ORDER GRANTING ADMISSION *PRO HAC VICE*

This matter having been opened to the Court by McCarter & English, LLP, attorneys for Defendant Qualcomm Incorporated, seeking an Order admitting Peter T. Barbur, Esq. and Elizabeth L. Grayer, Esq., attorneys at law of the State of New York *pro hac vice*, and the local counsel for Defendant (McCarter & English, LLP) having represented that Plaintiff has no objection to the entry of the within Order;

IT IS on this _____ day of _____, 2007,

ORDERED as follows:

1. Peter T. Barbur, Esq. and Elizabeth L. Grayer, Esq. be and are hereby admitted *pro hac vice* to appear in this matter for all purposes on behalf of Defendant Qualcomm Incorporated.
2. Peter T. Barbur, Esq. and Elizabeth L. Grayer, Esq. are required to abide by the Rules governing this Court, including all disciplinary rules, and to notify the Court immediately of any matter affecting his or her standing at the bar of any other court.
3. Peter T. Barbur, Esq. and Elizabeth L. Grayer, Esq. are deemed to consent to the appointment of the Clerk of the Court as agent upon whom service of process may be made for all actions against him or her or their firm that may arise out of their participation in this matter.
4. William J. O'Shaughnessy, Esq. of the firm of McCarter & English, LLP, and a member of the bar of this Court, has entered an appearance in this case and shall be counsel of record in accordance with Local Civil Rule 101.1(c)(3).
5. In accordance with Local Civil Rule 101.1(c)(2), Peter T. Barbur, Esq. and Elizabeth L. Grayer, Esq. will make payment to the New Jersey Lawyers' Fund for Client Protection as provided by New Jersey Rule 1:28-2(a).

Honorable John J. Hughes, U.S.M.J.

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QUALCOMM INCORPORATED,	:	
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Defendant.	:	

CERTIFICATION OF SERVICE

RICHARD HERNANDEZ, of full age, certifies as follows:

1. I am an attorney at law of the State of New Jersey and am associated with the firm of McCarter & English, LLP, attorneys for Defendant Qualcomm Incorporated.

2. On October 9, 2007, I caused to be delivered by ECF a copy of the foregoing papers to the following:

David S. Stone, Esq.
Boies, Schiller & Flexner LLP
150 John F. Kennedy Parkway
Short Hills, New Jersey 07078

Steven John Kaiser, Esq.
Cleary Gottlieb Steen & Hamilton LLP
2000 Pennsylvania Avenue, NW
Washington, DC 20006

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

s/ Richard Hernandez
Richard Hernandez

DATED: October 9, 2007